

Kevin T. Lafky, OSB#852633
klafky@lafky.com
LAFKY & LAFKY
429 Court Street NE
Salem, OR 97301
Tel: (503)585-2450
Fax: (503)585-0205
Of Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

Eugene Division

MARTIN G. CHILDS,
Plaintiff,

v.

SERVICE EMPLOYEES
INTERNATIONAL UNION;
Defendant.

Case No. 6:20-cv-01610-MK

**PLAINTIFF'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO
AMEND COMPLAINT**

LR 7-1 CERTIFICATION

In compliance with LR 7-1, Plaintiff, by and through his attorney Kevin T. Lafky, conferred with counsel for Defendant and he does not oppose this motion.

MOTION

In accordance with Fed. R. Civ. P 6(b) and LR 16-3, Plaintiffs respectfully move this Court for an order extending the deadline for Plaintiff to file Amended Complaint from December 16, 2022 to December 21, 2022. This is Plaintiff's first request for an extension of

time to Amend Plaintiff's Complaint. An extension is necessary because of Plaintiff counsel's heavy work load and illness. The requested extension will not affect any other existing deadlines or trial dates. This motion is made in good faith and not for the purpose of undue delay.

CONCLUSION

For the forgoing reasons, Plaintiff respectfully request that this Court issue an order extending the deadline for Plaintiff to file an Amended Complaint from December 16, 2022 to December 21, 2022.

DATED this 16th day of December, 2022.

/s/ Kevin T. Lafky
Kevin T. Lafky, OSB#852633
klafky@lafky.com
Dori M. Brattain, OSB#010233
dbrattain@lafky.com
LAFKY & LAFKY
Of Attorneys for Plaintiff